

EXHIBIT 5

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

SHELDON LOCKETT; MICHELLE) Case No.
DAVIS; and CLYDE DAVIS,) 18-CV-5838-PJW
Plaintiffs,)
)
vs.)
)
COUNTY OF LOS ANGELES, a public)
entity; LOS ANGELES COUNTY)
SHERIFF'S DEPARTMENT, a law)
enforcement agency; SHERIFF JIM)
McDONNELL; MIZRAIN ORREGO, a)
Deputy Los Angeles County)
Sheriff; SAMUEL ALDAMA, a)
Deputy Los Angeles County)
Sheriff; and DOES 1 through)
100, inclusive,)
)
Defendants.)
)

VIDEOTAPED DEPOSITION OF DEPUTY AUSTREBERTO GONZALEZ

Volume I

Via Videoconference

Tuesday, August 11, 2020

Reported by:
Gideon Choi
CSR No. 1325

1	BY MR. SWEENEY:	11:16:46
2	Q What is your knowledge based on, sir?	11:16:47
3	A My knowledge is that after a shooting, there is	11:16:49
4	998 debriefs. People get invited, certain people, not	11:16:54
5	everybody at the station. They go to a bar, they have	11:17:00
6	drinks, they celebrate together, and oftentimes the	11:17:04
7	deputy and the partner will get inked afterwards.	11:17:12
8	Q Okay. And have you found that these inkings are	11:17:14
9	like a reward for doing the shooting?	11:17:21
10	MR. IVIE: Objection; leading; suggestive.	11:17:31
11	MR. NISHIMURA: Lacks foundation.	11:17:33
12	THE WITNESS: Well, I mean, yes. What else can you	11:17:35
13	call it? I think it is some type of reward. A lot of	11:17:38
14	deputies, we call them prospects because, you know,	11:17:44
15	they're hurting and they're want that. They acknowledge	11:17:47
16	they're chasing ink which is, you know, that they want	11:17:50
17	to get inked. And so call it coincidence. I mean, you	11:17:53
18	know, they get inked oftentimes after a shooting.	11:17:59
19	BY MR. SWEENEY:	11:18:04
20	Q You said or you used the term "chasing ink"; is	11:18:05
21	that what you said?	11:18:09
22	A Yes.	11:18:09
23	Q So with this gang, it's your testimony that	11:18:10
24	prospects are encouraged to do shootings or violent acts	11:18:21
25	in order to get inked?	11:18:27

1 MR. IVIE: Objection; leading; suggestive; no 11:18:29
2 foundation. 11:18:31
3 THE WITNESS: It is my knowledge that by common 11:18:34
4 practice with the group, that if you quote/unquote 11:18:40
5 "work", if you're cooking, if you are involved in a 11:18:45
6 shooting, I mean, like I said, history will show that 11:18:52
7 they get inked. So we call it ink chasers because 11:18:56
8 they're out there trying to show the rest of the 11:19:00
9 members, the rest of the inked members that, you know, 11:19:04
10 they're worthy of that tattoo. 11:19:07
11 BY MR. SWEENEY: 11:19:09
12 Q Have you heard anyone say or do you have any 11:19:11
13 knowledge -- strike that. 11:19:14
14 Do you have any knowledge that Deputy Aldama was 11:19:14
15 chasing ink when he did his shooting of a citizen? 11:19:21
16 MR. IVIE: Objection; leading; suggestive; and no 11:19:26
17 foundation. 11:19:28
18 MR. SWEENEY: You can answer. 11:19:34
19 THE WITNESS: Could you repeat the question? I'm 11:19:35
20 sorry. 11:19:36
21 BY MR. SWEENEY: 11:19:37
22 Q Sure. Do you have any knowledge that 11:19:37
23 Deputy Aldama was, as you said, chasing ink when he shot 11:19:40
24 a citizen? 11:19:46
25 MR. IVIE: Leading; no foundation. 11:19:47

1 CERTIFICATION

2 OF

3 CERTIFIED SHORTHAND REPORTER

4

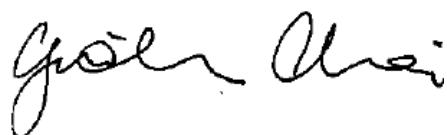
5 I, the undersigned, a Certified Shorthand
6 Reporter of the State of California do hereby certify:

7 That the foregoing proceedings were taken before
8 me at the time and place herein set forth; that any
9 witnesses in the foregoing proceedings, prior to
10 testifying, were placed under oath; that a verbatim
11 record of the proceedings was made by me using machine
12 shorthand which was thereafter transcribed under my
13 direction; further, that the foregoing is and accurate
14 transcription thereof.

15 I further certify that I am neither financially
16 interested in the action nor a relative or employee of
17 any attorney of any of the parties.

18

19 IN WITNESS HEREOF, I have this date subscribed
20 my name

21 
22

23 Gideon Choi, CSR

24 Certificate No. 13258

25 Dated: August 12, 2020